

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

GHULAM ANJUM,)	CASE NO. 2: 06 CV 00319
)	
Plaintiff,)	JUDGE SMITH
)	MAGISTRATE JUDGE ABEL
-vs-)	
)	
MARK HANSEN, et al.,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR CONTINUANCE

Comes now the Plaintiff, Ghulam Anjum, by counsel, and respectfully submits his Motion for Continuance for the May 17, 2007 Preliminary Pretrial Conference and in support of said Motion would show the Court the following:

1. Counsel has a conflict with the May 17, 2007, Preliminary Pretrial Date. Counsel will be guest speaking in Memphis Tennessee at the Federal Bar Association Annual Immigration Seminar. Attached is a copy of the seminar curriculum indicating counsel as a guest speaker;
2. Assistant United States Attorney Christopher Yates has NO objection to this motion.

WHEREFORE, the Plaintiff, by counsel prays that this cause be reset for another Preliminary Pretrial Hearing at a later date.

Respectfully submitted,

/S/ Douglas S. Weigle

Douglas S. Weigle, Esq. (OH #0000747)
Attorney for Plaintiff, Ghulam Anjum
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Summary Judgment has been served upon Christopher Yates, Attorney for Defendants, via the Court's electric filing system this _____ day of April, 2007.

/S/ Douglas Weigle

Douglas S. Weigle, Esq.

Federal Bar Association - Annual Immigration Seminar

Co-sponsored by the following: Memphis Bar Association; FBA Immigration Law Section & The U.S. District Court for the Western District of Tennessee, through its Court Improvement Fund

Thursday, May 17, 2007

Event will be held at: The University of Memphis School of Law, 3715 Central Avenue, Memphis, TN 38152.

***** Dinner the evening before the Seminar, Wednesday, May 16, 2007 @ 6:00PM at the Abyssinia Restaurant – Dutch Treat [2600 Poplar Avenue Suite 115, Memphis, TN 38112 (901) 321-0082 across the street from Los Compadres] Please RSVP to Barry Frager @ 901-763-3188 by May 15, 2007, if you can attend this dinner. The cost of dinner is \$15.00 per person (plus gratuity,) which includes dinner/tax/ and non-alcoholic drinks. [Ethiopian beers available for an additional charge]

RECOMMENDED TRACK FOR FBA MEMBERS & CRIMINAL ATTORNEYS IS TRACK 2
RECOMMENDED TRACK FOR Pro Bono ATTORNEYS IS TRACK 3 (Alternatively 2)

- | | | |
|---------------|------------------------|---|
| 8:30 – 8:45 | | Registration and Introduction [Barry Frager, Shea Wellford] |
| 8:45 – 10:15 | TRACK 1- | Memphis CIS Q&A , Including Problem Areas Where USCIS Shares Jurisdiction with the Immigration Court [Diane Campbell, Clarence Wagner, Tom Davis, Robert Divine, Ken Elwood] |
| | <u>Ethics</u> TRACK 2- | Professional Ethics in Immigration Law / UPL [Jesse Joseph, Barry Walker, Jeff Hill, Jennifer Peacock, Sean Lewis] |
| | TRACK 3- | Bond Proceedings and Mandatory Detention before EOIR [Charles Pazar, Charla Haas, Rick Averwater, Jimmy Mounce] |
| 10:15 – 10:30 | BREAK | |
| 10:30 – 12:00 | TRACK 1- | Advanced H1B and PERM Practice and Update [David Ware, Jose Perez, Tommy Rosser] |
| | TRACK 2- | USICE Enforcement Priorities Panel w/Q&A [Jimmy Mounce, Jesse Blakeman, Jeffrey Powell, Clarence Wagner, Ken Elwood] |
| | TRACK 3- | Relief in Removal Proceedings before the Court [Lawrence Burman, Rusty O'Brien, Jack Richbourg] |
| 12:00 – 12:15 | LUNCH | (India Palace Restaurant will cater)
1720 Poplar Avenue, Memphis, TN 38104 (278-1199) |
| 12:15 - 1:00 | | The Impact of Comprehensive Immigration Reform on our Immigration and Criminal Practices
[Greg Siskind, Barry Frager] |

- 1:00 – 2:30 TRACK 1- BIA Appeal of IJ Decision, Motion to Reopen before the IJ/BIA and Appellate Litigation at US Court of Appeals [Tanya Myers]
- Dual** TRACK 2- Immigration Law & the Federal District Courts [Jon McCalla, Tu Pham, Charles Pazar, Stephen Hall]
- TRACK 3- Presenting an Asylum Case in Immigration Court [Lawrence Burman, Cori Hash, Jack Richbourg]
- 2:30 – 3:45 TRACK 1- Presenting an Asylum Case in Court under the Real ID Act [Charles Pazar]
- TRACK 2- What a Criminal Lawyer Must Know About the Immigration Consequences of Criminal Convictions [Rick Averwater, Doug Weigle, Tanya Myers]
- TRACK 3- Preparing for an Interview on Adjustment of Status and Naturalization before USCIS in Memphis and Louisville. When Should I Consular Process? [Jose Perez, David Ware, Rusty O'Brien, Ari Sauer]
- 3:45 – 4:00 **BREAK**
- 4:00 – 5:30 TRACK 1- Stump the Experts: How to Resolve Problem Cases before either the USCIS; Department of State; Department of Labor and/or the Immigration Court. [Robert Divine, David Ware, Greg Siskind, Barry Frager, Jose Perez]
- TRACK 2- Presenting Cases in Court for Persons with a Criminal History, Such as 212(c) Relief, E-42B and Waivers of Inadmissibility for Persons with Criminal Convictions. [Rusty O'Brien, Clarence Wagner, Charla Haas]
- TRACK 3- Violence Against Women Act (VAWA) Cases Child Status Protection Act and Child Citizenship Act of 2000 [Ari Sauer, Brandi Simon]
- 5:30 PM **END OF CLE PROGRAM**
- 6:00PM- Group Going to Memphis in May BBQ Festival – Downtown Memphis [look up on the web for more information on the Memphis in May BBQ Festival] <http://www.memphisinmay.org>

Memphis Immigration Court (EOIR) Quarterly Meeting will be held on Friday, May 18, 2007, at 9:30AM at the Memphis Federal Building, 167 N. Main Street, 4th floor - Room 460, in Courtroom A. (Tele-video participation available from the Louisville Courtroom.) This meeting is open to all Attorneys to meet with the EOIR staff and the Attorneys from the DHS Memphis Office of the Chief Counsel of USICE. No RSVP required if attending this meeting at EOIR.

Hotel accommodations are at the Holiday Inn across the street from the University Of Memphis School of Law at 3700 Central Avenue (901) 678-8200. Accommodations may also be available at the Fogelman Center: 330 Innovation Drive - 901.678.5410.

Attorney CLE Registration fee ranges between \$175-\$200 in advance of the event if paid prior to May 11, 2007. After that date or at the door, Attorney CLE registration fee ranges between \$125-\$225 per Attorney. Paralegals are welcome and may register at a rate between \$ 50-\$ 125 per Paralegal/Legal Assistant. CJA & Pro Bono Attorneys and Staff have a Special flat rate of \$100 (with proof of CJA participation or certain pro bono obligations, accordingly). Law Students can enroll at a special rate of \$25.

All licensed Attorneys and their Paralegal/Legal Assistants and Law Students are welcome to attend. Attorneys can receive up to a total of 8 hours; between 5-8 of General and between 0-1.5 of Dual & 0-1.5 of Ethics in Tennessee (Course # -----). CLE for other jurisdictions may be requested by a participant. *Registration fee includes seminar, materials, and lunch.*

Program Speakers are:

Richard Averwater	(USICE, Assistant Chief Counsel - Memphis, TN)
Jesse Blakeman	(USICE - Group Supervisor, Off of INV- Memphis, TN)
Lawrence Burman	(EOIR-Immigration Judge-Memphis, TN)
Diane Campbell	(USCIS -Field Office Director - Memphis, TN)
Thomas Davis	(USDOJ - EOIR - Court Administrator - Memphis, TN)
Robert Divine	(Immigration Attorney - Chattanooga, TN (Former Act DIR CIS-HQ)
Ken Elwood	(Former INS District Director - Philadelphia, Pennsylvania)
Barry Frager	(FBA, Immigration Law Section Chair - Memphis, TN)
Charla Haas	(Immigration Attorney - Nashville, TN)
Stephen Hall	(USDOJ - Asst. US Attorney (WDTN) - Memphis, TN)
Cori Hash	(Immigration Attorney - Lexington, Kentucky)
Jeff Hill	(TN Assistant SAG - Consumer Affairs Division - Nashville, TN)
Jesse Joseph	(Disciplinary Counsel for TN-BOPR, Nashville, TN)
Sean Lewis	(Immigration Attorney - Memphis, TN)
Jon McCalla	(US District Court Judge - WDTN - Memphis, TN)
Jimmy Mounce	(USICE - SDDO - Memphis, TN)
Tanya Myers	(Immigration Attorney - Los Angeles, California)
Rusty O'Brien	(Immigration Attorney - AILA Chapter Chair - Louisville, Kentucky)
Charles Pazar	(EOIR - Immigration Judge - Memphis, TN)
Jennifer Peacock	(TN Assistant SAG - Consumer Affairs Division - Nashville, TN)
Tu Pham	(US District Court - WDTN - Magistrate Judge - Memphis, TN)
Jose (Joe) Perez	(Immigration Attorney - Houston, Texas)
Jeffrey Powell	(USICE -Group Supervisor, Off of INV - Memphis, TN)
Jack Richbourg	(Immigration Attorney - Memphis, TN)
Tommy Rosser	(Immigration Attorney - Oxford, Mississippi)
Ari Sauer	(Immigration Attorney - Memphis, TN)
Brandi Simon	(Immigration Attorney - Lexington, Kentucky)
Greg Siskind	(Immigration Attorney - Memphis, TN)
Clarence Wagner	(Deputy Chief Counsel - USICE - New Orleans, Louisiana)
Barry Walker	(Immigration Attorney - Tupelo, Mississippi)
David Ware	(Immigration Attorney - New Orleans, LA)
Doug Weigle	(Immigration Attorney - Former FBA Section Chair - Cincinnati, Ohio)
Shea Wellford	(FBA Mid-South Chapter Board Member-Memphis, TN)